

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

SR-6J

October 3, 2012

Mr. Michael J. Erickson Vice President ARCADIS 10559 Citation Drive, Suite 100 Brighton, Michigan 48116

RE:

Area 3: Proposed Survey and Field Sampling Plan

Dear Mr. Erickson:

The United States Environmental Protection Agency (EPA) has completed its review of the revised Area 3 Proposed Survey and Field Sampling Plan, submitted on October 2, 2012, for the Allied Paper,Inc./Portage Creek/Kalamazoo River Superfund Site. This latest field sampling plan incorporates additional information, based upon recent conversations and the September 27, 2012, meeting with representatives of both EPA and the Michigan Department of Environmental Quality (MDEQ).

Although EPA approves the Area 3 Survey and Field Sampling Plan and anticipates field work proceeding on schedule, there are a few issues for Georgia-Pacific, LLC (GP) to consider as the Remedial Investigation (RI) work is completed.

- Depending upon the results of this sampling effort EPA may require additional sample collection in the spring of 2013 to adequately determine the nature and extent of contamination in Area 3. Therefore, EPA requests that the data, as well as maps highlighting sample results, be provided to both EPA and MDEQ by no later than February 1, 2013. Further, a meeting should be held by Mid-February to discuss the sample results and any additional data needs.
- The results of the Pine Creek area sampling will have to be evaluated to determine if additional sampling is required.
- Rather than sample the Old Raceway channel at this time, GP has proposed evaluation of
 existing data and historical information. Since EPA has not seen that information, this
 approach may not be adequate to complete the RI. Therefore, GP should summarize that
 information and provide it to EPA and MDEQ before the meeting in February 2013.

• Finally, no sampling for non-polychlorinated biphenyl (PCB) constituents has been proposed in Area 3 during this first sampling event. GP is submitting an evaluation report of existing non-PCB sampling information to support future sampling for PCBs only (including Area 3). Depending upon EPA's review of that report, a non-PCB sampling program, consistent with that conducted in Area 2, may be required to be implemented in the spring 2013.

Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,

James A. Saric

Remedial Project Manager

SFD Remedial Response Branch #1

cc: Paul Bucholtz, MDNRE

Garry Griffith, Georgia-Pacific

Richard Gay, Weyerhaeuser